

Steven M. Stancliff

From: Bennett III, William R. <wbennett@BlankRome.com>
Sent: Monday, December 09, 2013 1:51 PM
To: George M. Chalos; Kellye Logwood; Steven M. Stancliff; pbrogan@daveybroganpc.com
Cc: Wilgus, Lauren
Subject: RE: FLAME S.A. v. Industrial Carriers, Inc. - Plaintiff's First Set of Requests for Production of Documents to Defendants

George,

Based upon the Declaration of Mr. Baranskiy, in particular that statement:

Vista began trading in the shipping market during November 2008, and as I explained above, I used my personal savings and borrowings to fund its initial activities. At the time, hire rates were only a few hundred USD /day so this was manageable for me.

please have Mr. Baranskiy provide all personal banking records supporting this allegation.

William R. Bennett, III | Blank Rome LLP

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Phone: 212.885.5152 | Fax: 917.332.3858 | Email: WBennett@BlankRome.com

From: George M. Chalos [mailto:gmc@chaloslaw.com]
Sent: Monday, December 09, 2013 1:40 PM
To: 'Kellye Logwood'; 'Steven M. Stancliff'; pbrogan@daveybroganpc.com
Cc: Bennett III, William R.; Wilgus, Lauren
Subject: RE: FLAME S.A. v. Industrial Carriers, Inc. - Plaintiff's First Set of Requests for Production of Documents to Defendants

Thanks for this. . .

Reverting/GMC

George M. Chalos, Esq.
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Please visit our website at: www.chaloslaw.com

From: Kellye Logwood [mailto:KLogwood@cwm-law.com]
Sent: Monday, December 09, 2013 11:34 AM
To: Steven M. Stancliff; George M. Chalos; pbrogan@daveybroganpc.com
Cc: 'Bennett III, William R.'; 'Wilgus, Lauren'



Subject: RE: FLAME S.A. v. Industrial Carriers, Inc. - Plaintiff's First Set of Requests for Production of Documents to Defendants

Attached please find the Word version of Plaintiff's Supplemental Requests for Production of Documents to Defendants.

Kellye Logwood, Legal Assistant

CRENSHAW, WARE & MARTIN, P.L.C.

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From: Steven M. Stancliff

Sent: Sunday, December 08, 2013 11:41 AM

To: George M. Chalos; pbrogan@daveybroganpc.com

Cc: 'Bennett III, William R.'; 'Wilgus, Lauren'; Kellye Logwood

Subject: RE: FLAME S.A. v. Industrial Carriers, Inc. - Plaintiff's First Set of Requests for Production of Documents to Defendants

Gentlemen: Attached are Flame's revised requests for production. Kellye will send MS Word document tomorrow. Best, Steve

Steven M. Stancliff, Esquire

CRENSHAW, WARE & MARTIN, P.L.C. | 150 W. Main Street, Suite 1500 | Norfolk, VA 23510 | (757) 623-3000 | Fax (757) 623-5735 | www.cwm-law.com | sstancliff@cwm-law.com

From: George M. Chalos [<mailto:gmc@chaloslaw.com>]

Sent: Saturday, December 07, 2013 9:37 AM

To: 'Bennett III, William R.'; Kellye Logwood; pbrogan@daveybroganpc.com

Cc: Steven M. Stancliff; 'Wilgus, Lauren'

Subject: RE: FLAME S.A. v. Industrial Carriers, Inc. - Plaintiff's First Set of Requests for Production of Documents to Defendants

I did ... too broad.. You know this..

We are standing by.

George M. Chalos, Esq.

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From: Bennett III, William R. [mailto:wbennett@BlankRome.com]

Sent: Saturday, December 07, 2013 9:37 AM

To: 'gmc@chaloslaw.com'; 'KLogwood@cwm-law.com'; 'pbrogan@daveybroganpc.com'

Cc: 'sstancliff@cwm-law.com'; Wilgus, Lauren

Subject: Re: FLAME S.A. v. Industrial Carriers, Inc. - Plaintiff's First Set of Requests for Production of Documents to Defendants

George,

Please specify what in particular you find problematic. In the meantime, we will review the requests and revert.

Bill

From: George M. Chalos [mailto:gmc@chaloslaw.com]

Sent: Saturday, December 07, 2013 08:28 AM

To: 'Kellye Logwood' <KLogwood@cwm-law.com>; pbrogan@daveybroganpc.com <pbrogan@daveybroganpc.com>

Cc: 'Steven M. Stancliff' <ssstancliff@cwm-law.com>; Bennett III, William R.; Wilgus, Lauren

Subject: RE: FLAME S.A. v. Industrial Carriers, Inc. - Plaintiff's First Set of Requests for Production of Documents to Defendants

Gents –

Can you please narrow your requests #6-9. As presented, the requests are too broad and improper.

We look forward to hearing from you.

George M. Chalos, Esq.

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From: Kellye Logwood [mailto:KLogwood@cwm-law.com]

Sent: Friday, December 06, 2013 1:23 PM

To: pbrogan@daveybroganpc.com; gmc@chaloslaw.com

Cc: Steven M. Stancliff; Bennett III, William R. (wbennett@BlankRome.com); Wilgus, Lauren (LWilgus@BlankRome.com)

Subject: FLAME S.A. v. Industrial Carriers, Inc. - Plaintiff's First Set of Requests for Production of Documents to Defendants

Attached please find Plaintiff's First Set of Requests for Production of Documents to Defendants in the above-referenced matter. For your convenience, I have attached the Word format of the Requests for Production as well.

Kellye Logwood, Legal Assistant

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